



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GMP:MPR
F. #2009R01065

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 7, 2017

By ECF

A. Eduardo Balarezo, Esq.
400 Seventh Street, N.W.
Suite 306
Washington, D.C.

Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Counsel:

The government's next production of supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure will be available for you tomorrow to obtain from the third-party vendor. This production includes material that is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order. See Dkt. No. 57. The government is also producing draft transcripts pursuant to the parties' September 12, 2017 signed stipulation. This supplements discovery previously provided to the defense on March 8, 2017, April 10, 2017, May 5, 2017, June 7, 2017, July 21, 2017, September 19, 2017 and October 17, 2017. The government will continue to produce discovery on an ongoing basis. The government also requests reciprocal discovery from the defendant.

The Government's Discovery

Bates-stamped numbers

Description

00000091830 – 00000125232
00000125235 – 00000125450¹

Documents related to drug, money and
weapons seizures, including photographs,

¹ The following Bates-numbers were left intentionally blank: 00000092832 – 00000092849, 00000099350 – 000000107267, 000000116426 – 000000116442, 000000116444, 000000116452 – 000000116513, 000000117680 – 000000117682, 000000117691 – 000000117693, 000000118527 – 000000118539, 000000118647 –

	scientific reports, law enforcement reports and drug ledgers; court applications and orders; intercepted and recorded wire and electronic communications and accompanying draft transcripts, summaries and translations
00000125451 – 00000125504	Documents related to wire transfers
00000125505 – 00000125509	Photographs of a safe house used by the defendant
00000125510 – 00000125619	Documents related to drug seizures, including photographs and scientific reports; surveillance photographs; travel records
00000125620 – 00000125659	Documents related to a money seizure
00000125660 – 00000125702	Documents related to drug seizures, including law enforcement and scientific reports
00000125703 – 00000140995	Intercepted and recorded electronic communications and accompanying draft translations and summaries
00000140996 – 00000146857	Documents related to drug, money and weapons seizures and other related items, including scientific reports and law enforcement reports and analyses of electronic devices
00000146858 – 00000146864	Surveillance photos
00000146865 – 00000146874	Videos related to the following: a 1993 shooting at Guadalajara airport; the defendant's safe houses; the defendant's 2015 escape from prison; a law enforcement operation to recapture the defendant

000000119108, 000000120450 – 000000120886, 000000121008 – 000000121212, 000000121224 – 000000121441, 000000121800, 000000122305 – 000000122306.

00000146943 – 00000146944

139,772 intercepted wire communications

The government is also producing seventy-eight videos described below. The videos from each event contain audio and video footage that identifies law enforcement officers and other persons that cannot be redacted. The government is also making available unredacted versions of certain photographs described below, which are being produced to you today in redacted form. You may view the videos and photographs discoverable under Rule 16, by contacting a member of the prosecution team to arrange a mutually convenient time to view them at the United States Attorney's Office. Alternatively, the government will provide you copies of these documents on the condition that they remain in your possession, custody and control and not be left with the defendant at the MCC. These videos and photographs contain information subject to the April 3, 2017 Protective Order. See Dkt. No. 57.

Bates-stamped numbers

Description

00000125233 – 00000125234

Videos related to a drug seizure and a search of a rail car

00000146875 – 00000146940

Surveillance videos

00000146941 – 00000146942

Videos related to a drug seizure

00000125529A – 00000125596A

00000146858A – 00000146863A

Surveillance photos (The redacted versions of the photos are Bates-numbered 00000125529 – 00000125596 and 00000146858 – 00000146863)

The government is also producing color versions of black and white photographs produced in past discovery productions. Each color photograph is assigned the same Bates number as the black and white version of the photograph, but the Bates number

for the color version is followed by the letter “A” (e.g., Bates number 000011478A is the color version of the photograph assigned Bates number 000011478).

Very truly yours,

BRIDGET M. ROHDE
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Enclosures

cc: Clerk of the Court (BMC) (by ECF) (without enclosures)